

Stuart R. Day, W.S.B. # 5-2244  
WILLIAMS, PORTER, DAY & NEVILLE, P.C.  
159 No. Wolcott, Suite 400  
P.O. Box 10700  
Casper, Wyoming 82601  
Telephone: (307) 265-0700  
Facsimile: (307) 266-2306  
Emails: [sday@wpdn.net](mailto:sday@wpdn.net)

ATTORNEY FOR AMAZON DEFENDANTS

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse and )  
wrongful death personal representative of )  
DANIEL DEBEER, deceased, )

Plaintiffs, )

v. )

Civil No. 23-CV-33-ABJ

AMAZON LOGISTICS, INC. d/b/a )  
PRIME, AMAZON.COM, INC., )  
AMAZON.COM SERVICES LLC, )  
AAF555 LLC, NORTHWEST EXPRESS, LLC, )  
ASD EXPRESS, LLC, and JUSTIN NZARAMBA )

Defendants. )

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**DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

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Defendants Amazon Logistics, Inc. d/b/a Prime, Amazon.com, Inc., Amazon.com Services LLC, AAF555 LLC, Northwest Express, LLC, and Justin Nzaramba (hereinafter individually referred to as a "Party" or by name, and collectively referred to as "Defendants"), by and through their respective counsel, hereby move the Court to enter the attached Protective Order as follows:

1. During the course of discovery, the Parties will be exchanging information, documents, and other materials.

2. Defendants agree that information, documents, and other materials disclosed during discovery may contained confidential and sensitive information, which should not be disclosed outside this litigation.

3. Defendants agree that a protective order regarding the production of this information is warranted and have worked together and have agreed to the terms of a protective order, which is attached hereto.

4. The Court has previously entered the attached proposed Protective Order in *Kail et al. v. Caravan Cargo Group, Inc. et al.*, Case No. 22-CV-17-SWS; therefore, Defendants believe the proposed Protective Order is not unreasonable. (*See Kail et al. v. Caravan Cargo Group, Inc. et al.*, STIPULATED PROTECTIVE ORDER, ECF No. 92, Case No. 22-CV-17-SWS).

5. Undersigned counsel has met and conferred with Plaintiff's counsel regarding the proposed Protective Order.

6. Plaintiff's counsel opposed the entry of the proposed Protective Order as written but indicated he would provide proposed edits to the proposed Protective Order. In short, Plaintiff was not opposed to the entry of some form of protective order in this case but objected to the proposed Protective Order. However, to date, Plaintiff has not proposed alternative language to or versions of the proposed Protective Order.

7. In this case, a protective order is warranted in order to protect information, documents and other materials disclosed during discovery that is confidential and/or sensitive information. Defense counsel have agreed to a proposed Protective Order in a version that this Court has entered previously. Since a protective order is necessary and reasonable in this case, Defendant respectfully request the Court enter the attached Protective Order.

WHEREFORE, Defendants Amazon Logistics, Inc. d/b/a Prime, Amazon.com, Inc., Amazon.com Services LLC, AAF555 LLC, Northwest Express, LLC, and Justin Nzaramba, by and through their respective counsel, hereby jointly move the Court to enter the attached Protective Order.

Dated this 15<sup>th</sup> day of August, 2023.

/s/ Stuart R. Day  
Stuart R. Day, #5-2244  
Williams, Porter, Day & Neville, P.C.  
159 N. Wolcott, Suite 400  
Casper, WY 82601  
(307) 265-0700  
(307) 266-2306 (fax)  
[sday@wpdn.net](mailto:sday@wpdn.net)

*Attorneys for Amazon Defendants*

/s/ Zenith S. Ward  
Zenith S. Ward  
Buchhammer & Ward, P.C.  
1821 Logan Ave.  
P.O. Box 568  
Cheyenne, WY 82003-0568  
(307) 634-2184 Phone  
[zsw@wyoming.com](mailto:zsw@wyoming.com)

*Attorneys for Defendants AAF555, LLC,  
Northwest Express, LLC and Justin Nzaramba*

### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon all counsel of record by electronic service via the CM/ECF system this 15<sup>th</sup> day of August 2023.

/s/ Stuart R. Day  
Stuart R. Day